

1 Susan S.Q. Kalra (State Bar No. 167940)  
2 Email: [skalra@rameyfirm.com](mailto:skalra@rameyfirm.com)  
3 RAMEY LLP  
4 5020 Montrose Blvd., Suite 800  
5 Houston, TX 77006  
6 Telephone: (800) 993-7499  
7 Fax: (832) 900-4941

8  
9 William P. Ramey, III (*pro hac vice anticipated*)  
10 Email: [wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)  
11 RAMEY LLP  
12 5020 Montrose Blvd., Suite 800  
13 Houston, TX 77006  
14 Telephone: (713) 426-3923  
15 Fax: (832) 689-9175

16 *Attorneys for Plaintiff*  
17 ESCAPEX IP, LLC

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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ESCAPEX IP, LLC,

Case No.: 3:22-cv-08711-VC

16 Plaintiff,

17 v.

18 GOOGLE LLC,

19 Defendant.

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**PLAINTIFF'S RESPONSE TO  
DEFENDANT'S SUPPLEMENTAL  
EVIDENCE RE: MOTION FOR  
ATTORNEYS' FEES PURSUANT TO 35  
U.S.C. § 285**

1 Pursuant to the Court’s request during the July 20, 2023 Hearing, Plaintiff Escapex IP,  
2 LLC’s (“Escapex”) provides its response to Defendant Google LLC’s (“Google”) Supplemental  
3 Evidence Re: Motion for Attorneys’ Fees (“Supplement”) (ECF 55).

4 Civil Local Rule 54-5(b)(2) requires declarations submitted in support of motions for  
5 attorney fees to include, among other things, “A statement of the services rendered by each  
6 person for whose services fees are claimed, *together with* a summary of the time spent by each  
7 person....” (emphasis added). The declarations submitted by Google’s counsel (ECF 51-1 and  
8 51-2) fail to comply with this Rule.

9 The Declaration of Brian Banner identifies three firm Shareholders who “billed” a  
10 specified number of hours “in connection with Google’s motion for fees”. (ECF 55-1, ¶¶ 5-7).  
11 Similarly, the Declaration of Asim M. Bhansali identifies two Partners and one Associate who  
12 “billed” a specified number of hours “in connection with Google’s motion for fees”. (ECF 55-2,  
13 ¶¶ 5-7). Rule 54-5(b)(2) requires more than a summary of the time spent by each person: it also  
14 requires a statement of the services rendered. The declarations submitted by Google’s counsel  
15 are devoid of any description of what services were rendered by each of the six persons  
16 identified in the declarations.

17 Therefore, Google should not be awarded the fees it seeks in its Supplement.

18 Dated: July 27, 2023

19 Respectfully submitted,

20 RAMEY LLP

21 /s/ Susan S.Q. Kalra  
22 Susan S.Q. Kalra (State Bar No. 167940)  
23 RAMEY LLP  
24 5020 Montrose Blvd., Suite 800  
25 Houston, Texas 77006  
26 Telephone: (800) 993-7499  
Fax: (832) 900-4941  
Email: skalra@rameyfirm.com

/s/ William P. Ramey, III  
William P. Ramey, III (pro hac vice  
anticipated)  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
Telephone: (713) 426-3923  
Fax: (832) 689-9175  
Email: [wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)

Attorneys for Plaintiff  
ESCAPEX IP, LLC